

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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NOTICE OF MOTION  
TO WITHDRAW

UNITED STATES OF AMERICA,

v.

19-CR-227 (JLS) (MJR)

JOSEPH BONGIOVANNI,  
PETER GERACE, JR.,

Defendants.

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UNITED STATES OF AMERICA,

v.

23-CR-37 (JLS) (MJR)

PETER GERACE, JR.,

Defendant.

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MOTION MADE BY:

Eric M. Soehnlein, Esq.

DATE, TIME AND PLACE:

At a date and time determined by the Court, Robert H. Jackson Courthouse, 2 Niagara Square, Buffalo NY 14202.

SUPPORTING PAPERS:

Attorney Declaration, Ex-Parte Declaration, Ex-Parte Memorandum of Law.

RELIEF REQUESTED:

An Order of this Court:

1. Granting undersigned's motion to withdraw as counsel for defendant, Peter Gerace, Jr.
2. For such other and further relief as the Court deems just and proper.

DATED: Buffalo, New York  
June 26, 2023

Respectfully submitted,

**LIPPES MATHIAS LLP**

By: *s/Eric M. Soehnlein*  
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